

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF  
PENNSYLVANIA

AMANDA OLEWILER  
TEAGUE OLEWILER ,

Plaintiffs,

v.

GETTYSBURG COLLEGE  
PRESIDENT ROBERT IULIANO AND ALL BOARD MEMBERS

Defendants

Jury Trial Demanded.

Nota Bene

I, Amanda Olewiler, will be representing myself and Teague Olewiler (who was a minor at the time the violations of federal law started)

We are unable to find an attorney willing to PUBLICLY represent a white male for violations of his Civil Rights. We have done an exhaustive search.

Some of this information might be confidential due to an "NDA".

The NDA was signed under extreme duress.

Violation of Title VI of the Civil Rights Act of 1964 (prohibits Discrimination AND Retaliation).

Breach of Contract

Fraud

Negligence

Negligent Misrepresentation

Breach of NDA

NDA signed under Duress/Fraudulent NDA

Preliminary Statement and Factual Background

1. In the Fall of 2020, our son, Teague Olewiler, was a Freshman student at Gettysburg College, and a student of Dr. Jacquelynne Milingo. He was a minor (recently turned 17), and also a *minority* on campus as a male. He was a student during the pandemic and was often masked and isolated. Most meals were eaten alone in his dorm room.

1:24-cv-00824

**FILED**  
HARRISBURG, PA

MAY 20 2024

PER

DEPUTY CLERK

Dr. Jacquelynne Milingo, was in a position of authority over our son, Teague Olewiler, as his Physics professor.

Dr. Jacquelynne Milingo repeatedly and publicly displayed overt bigotry towards our son due to his race and sex in front of a classroom full of witnesses.

Please see link for details...

<https://rumble.com/v1om9cy-anti-white-psychotic-professor-drives-students-to-suicide-cowardly-universi.html>

Also, see her testimony in Bias Incident Report wherein she admits to singling out “white males”.

When our son could not make it to her class one week (on the medical advice of the campus nurse due to an illness), Dr. Jacquelynne Milingo demanded an immediate zoom meeting, despite her already having been notified of his planned and excused absence via email.

During this zoom meeting she berated him (while he was feverish and exhausted) for missing her class. What should have been a *safe space* for him to heal and rest became a private hell.

Furthermore, *by her own admission*, she attempted and **did** elicit private medical information from him, **violating HIPPA policy**. See below link and also Bias Incident Report...

<https://www.standardsofcare.org/understanding-care/confidentiality-and-hipaa/>

Dr. Jacquelynne Milingo has a history of attacking codes of conduct. Please see link and quote below...

<https://gettysburgian.com/2019/11/faculty-meeting-news-and-notes-november-7-2019/>

□ “Associate Professor of Physics Jacquelynne Milingo presented a pair of motions on behalf of the Faculty Grievance Committee that sought to amend the Faculty Handbook to remove from the expectations for department chairpersons a clause that charged them to “set the example for personal professional behavior.” The motion’s rationale stated that the revision was “aimed at removing inconsistencies in the FH [Faculty Handbook] with respect to statements of behavior expectations,” and Milingo added that, if the faculty handbook is to contain behavioral expectations, they should apply to all faculty, not just chairs.

The second motion sought to add a clause to the expectations for all faculty promoting collegiality. The latter motion, in particular, drew concern from faculty members who expressed concern that perceived lack of collegiality might prevent someone from receiving tenure, that the motion’s language was overly prescriptive, and with various aspects of the motion’s wording.

The faculty did not vote on either motion after it became clear that unanimous consent

would not be obtained and that, therefore, it would need to return at another meeting regardless.”

Dr. Eloise Gordon- Mora, Gettysburg College’s Chief Diversity Officer:

No attempt to reach out to support/advise us when the malicious persecution of our son, based on his race and sex, was revealed.

Dr. Eloise Gordon-Mora did actively assist the “oppressor”, Dr. Jacquelynne Milingo, by advising her and sitting in with her during the Bias Incident Interview. **She did this despite our son being in a position of subjugation, of being in a minority, being a minor, and being the victim of overt bigotry which was witnessed by others.**

Furthermore, Dr. Eloise Gordon-Mora sent out an email to **faculty** (*not students*) reassuring them that the Bias Incident Report system will be “amended over the next half of the year.” Why?

More students file Bias Incident Reports...please see link and quote below

<https://www.yaf.org/news/tired-of-white-cis-men-gettysburg-college-wants-you-to-paint-your-frustrations/>

”He and other YAF students have submitted complaints through the institution’s bias incident reporting system. Gettysburg policy [defines](#) a bias incident as “behavior that is derogatory in nature” and targets an individual based on their protected characteristics, including race, gender, and sexual orientation. Without a doubt, this event is designed to encourage bias and resentment against students of a particular race, gender, and sexuality at Gettysburg College.”

Please see link and quote below...

<https://gettysburgian.com/2022/12/faculty-meeting-news-and-notes-dec-1-2022/>

”In the final portion of the meeting, Chairperson of Physics Bret Crawford addressed a bias complaint made against physics professor Jacquelynne Millingo. He said the complaint raises issues with the bias complaint process in general, and appreciated Chief Diversity Officer Dr. Eloisa Gordon-Mora’s email earlier this week explaining that the bias reporting process would be amended over the next half of the academic year.”

2. \$40,000+ paid in tuition/year (+ interest) at an institution that marketed inclusivity and engagement.  
See Diversity Statement by College President, Mr. Bob Iuliano. (link

provided below)

See Student Rights and Responsibilities from Gettysburg College's Handbook (link also provided below)

"If we want to prepare our students for an increasingly diverse society, they must learn how to embrace difference here. If we want to graduate the next generation of leaders, who themselves will be drawn from our increasingly diverse society, we must continue to make this place a home for all of our students." President Bob Iuliano

<https://www.gettysburg.edu/offices/student-rights-responsibilities/student-handbook/policy-details?id=57b3bcff-7b3b-40a3-ba3c-5eb9a6a0fc3e#ahb-policy>

<https://www.gettysburg.edu/offices/student-rights-responsibilities/student-handbook/policy-details?id=406815a9-9228-4dcb-b95a-9fb64663cc2f>

President Bob Iuliano also stated...

"It is **fundamental** to our mission that every Gettysburgian finds our community to be an inclusive, welcoming home, where they can do their best work and be their authentic self. A place that recognizes that creating a truly inclusive community is **EVERYONE'S RESPONSIBILITY** and ultimately enriches the entire community." President Bob Iuliano

Yet, when we reported the bigotry to President Iuliano, Board Chair, Mr. David Brennan, Vice Chair, Ms. Lauren Wise Bright, (and addressed to all board members) we were passed down to the Provost, Mr. Christopher Zappe. Mr. Zappe, passed us down to the Assistant Provost, Mr. Jack Ryan. Mr. Ryan passed us down to Ms. Jennifer Lucas, Executive Director of Human Resources. Ms. Lucas's final response to us September 28<sup>th</sup>, 2022, after months of inaction?

"I'm hopeful that we can schedule some time to talk with her in the very near future." Ms. Jennifer Lucas

We never heard from her again.

**. Our son's college "experience" was destroyed by the malice he suffered at the hands of his professor. His grades dropped precipitously and his motivation was severely curtailed.**

**The effects are ongoing and reflected in lower grades and less engagement on campus.**

**\*(Gettysburg College does make it very difficult to transfer credits if a student would like to change colleges).**

**3. Our son, Teague, was excluded based on his white race and male sex and mocked when attempting to contribute in class. This is a violation of his**



First Amendment Rights. **He was not alone...**

**<https://www.ratemyprofessors.com/professor?tid=169852>**

**<https://nypost.com/2022/11/14/gettysburg-college-postpones-event-for-people-tired-of-white-cis-men/>**

**All this was taking place while Gettysburg College had anti-white books highlighted all over their website and in their library. One of the books they were showcasing was called "Even the Rat was White".**

**Our son chose Gettysburg College. He was honored to be coming here. He had studied hard, maintained a high GPA, did very well on his SAT's, and graduated a year early. He earned a scholarship. His whole family, including grandparents and aunts and uncles, were proud of him. He worked 2 jobs over the summer to help pay for expenses, even making and packing his own lunches to save money and driving to his jobs in his mom's minivan.**

**He was ready to make new friends and study his passion, physics, and eager to see what he could offer to the college.**

**But Gettysburg College, who was happy with the color of his money, was not happy with the color of his skin or with his sex... and had no problem telling him. He was publicly called out by his Physics professor for being a "generic" and "unnecessary" white male" and was repeatedly subject to this publicly witnessed, overt bigotry. This happened week after week. Any attempts to participate in class were met with mockery, so he learned to keep his mouth shut to soften the blows. And when our son couldn't make it to her humiliation session one week due to illness, she zoomed herself into his dorm room to bring it to him while he lay sick in bed.**

**For more details please see link... <https://rumble.com/v1om9cy-anti-white-psychotic-professor-drives-students-to-suicide-cowardly-universi.html>**

**Also, see filed Bias Incident Report.**

**Such an egregious abuse of power by those who are being paid to teach and encourage their students. And it was done during a pandemic, on a minor Freshman, who was isolated and masked and new on campus. And all while sitting on the statistics of 50 attempted suicides at their school the previous year. Let me say that again. This was all done while sitting on the**

statistics of 50 attempted suicides at their school the previous year.

**And when concern is raised and facts presented? We were ignored....after all our son was viewed as “unnecessary”. This was not ignorance...this was intentional. And this was from the top down.**

**Systemic bigotry. Systemic anti-whiteism. Systemic malice towards males.**

#### **RETALIATION in violation of Title VI of the Civil Rights Act of 1964:**

**When our son returned to campus in January 2023 (after filing Bias Incident Report) cameras had been installed all around the perimeter of his Fraternity House and one inside.**

**The Fraternity Brothers were given a bill for a broken door that had been in ill repair for years but which now fell on them to pay for.**

**Campus Police were dispatched to their house multiple times a day, every day, for “inspections”.**

**The situation became so desperate that the President of the Fraternity finally broke down (after getting no where with administration) and asked all the Brothers to call their parents and ask them to intervene by calling/emailing and demanding an end to the harassment.**

**Only after the parents intervened did the campus police stop their daytime intimidation tactics.**

**On the weekends/nights, Campus police were dispatched to their house at the beginning of all gatherings and also at the end of them. This was then increased to coming a THIRD time, during the middle of their events.**

**The harassment was relentless.**

#### **MORE RETALIATION**

**The following letter was sent to Department Chair of Physics, Dr. Brett Crawford, President Bob Iuliano, Provost Jamila Bookwala, and Executive Director, Jennifer Lucas on January 3, 2024 (post “NDA”)**

**Dear Dr. Crawford,**

**Good Morning.**

**We are writing to get clarification on our son's advisory meeting with you this past semester regarding career opportunities, networking, and referrals/recommendations.**

*(As you know, regrettably, Dr. Good was unexpectedly removed as our son's advisor with the announcement of his retirement during Teague's Junior year.*

*Our son was then reassigned to you, Dr. Crawford, the Chair of the Physics Department.)*

**While we are grateful that he did receive an advisor... we are confused with the outcome of this meeting and about his future employment possibilities.**

**During the meeting he was refused any career advise, referrals, or recommendations and told simply that you "could not help him" and that you "have nothing for him".**

**(Surely, he is not the first student to want to pursue Business with a major in Physics and minor in Business?)**

**Furthermore, no offer was made to redirect him to someone who might be able to help him.**

**No phone calls made on his behalf nor emails sent that would give him any sense of where to turn.**

*If you have any such emails or communications, we would be grateful if you could forward them to our son and/or us.*

**We are aware of your public statement on our son's Bias Incident complaint (see below), posted in the campus newspaper, The Gettysburgian, as was the entire campus community which included our son's professors, fellow students, and friends.**

**<https://gettysburgian.com/2022/12/faculty-meeting-news-and-notes-dec-1-2022/>**

**While this did present another challenge to him on campus, he chose again, to persevere.**

**And, despite this, we were hopeful of amendment and good will moving forward...but the outcome of this meeting and thus his future career placement through Gettysburg College speaks otherwise. This causes concern, also, as our son will be taking his final Physics class with you before graduating this Spring.**

**Since our son was a minor when his Bias Incident occurred and recent**

actions contradict what Gettysburg advertises (see link below) we, his parents, would appreciate a response to our concerns.

<https://www.gettysburg.edu/news/stories?id=827fb13a-9dde-467e-96e3-eacae4d7746e&pageTitle=Gettysburg%E2%80%99s+culture+of+advising+%3A+Developing+and+supporting+the+whole+student>

We are copying to Gettysburg College President (Mr. Iuliano), Provost (Ms. Bookwala), and Executive Director of Human Resources, (Ms. Lucas).

Thank you for your time and prompt attention to this matter.

Sincerely,  
Dr. and Mrs. Scott Olewiler

No internships received (post filing of Bias Incident Report).

After this meeting with Dr. Crawford our son signed a contract to do door to door sales upon graduation so that he would have a means of income. This is a job he found on his own without any assistance at all from Gettysburg College.  
This job is outside of his field of study.

**NDA SIGNED UNDER EXTRME DURESS in September of 2023 (prior to Retaliation)**

Gettysburg College asked for an 'extension' to respond to our lawyer's very reasonable demands for restitution for the abuse he suffered. This "extension" coincidentally coincided with the release of our son's grades. (They were aware our son's grades had dropped due to the discrimination he had endured. It was highlighted in our lawyer's original letter to opposing counsel as one of the effects of their Title VI violation.) After grades were given they rescinded his scholarship and used it as a bartering tool for restitution. Our son also found himself locked out of his student account unable to even view his grades. He had to ask permission to get into his account.



**Not only does this seem highly unethical, illegal even...it also calls into question whether his grades were manipulated for a desired outcome. An outcome that was then used against us and our son's already battered emotional state.**

**NDA was drawn up and finalized by Gettysburg College one day from expiration of Statue of Limitations.**

**I was asked to review 11 page document in 24 hours and sign or we would lose our son's scholarship and any remedy at all.**

**(documentation can be provided)**

**As an aside, we had repeatedly and emphatically asked for a trial...we were refused.**

**(documentation can be provided)**

**We are only willing to file this lawsuit now, on the "eve" of graduation, due to safety concerns.**

### **Breach of NDA**

**The NDA states...**

**"Students Continued Study at the College. The College agrees that the Student will be permitted to continue his course of study at the College in the same manner and subject to the same policies as any other student, and without regard to the Discrimination Complaint or Media Statements."**

**He was denied advisory. This is not "the same manner" as other students.**

**The college had destroyed his 4 years at school and then did further attempt to destroy his future.**

**This is a school with an alarming and documented history of suicide attempts.**

**This borders on diabolic.**

**The NDA states...**

**"No Contact Order The No Contact Order will direct the Student and Dr. Milingo to refrain from communicating with one another, directly or indirectly (including through other persons acting on their behalf and interacting with one another, but it will not prohibit either of them from**

**engaging in College activities or events (even if the other person may be or is present) and will not restrict their ability to move about campus or campus buildings for any APPROPRIATE PURPOSES.”**

**However, Dr, Milingo did enter our son’s classroom in the Fall Semester of 2023 for a “piece of candy”. She then stayed and talked to our son’s classmates while he was left to stare at a wall in front of his peers. There are roughly 5 students in his class. He was visible. Further, she had no reason to enter his classroom.**

#### **Non Disparagement**

**Gettysburg College was asked to remove online article in February of 2024 wherein Dr. Brett Crawford states “ that the ‘slander statements’ [our complaint] against her [Dr. Milingo] should not go unaddressed”. This is among other statements referencing The Bias Incident Report and our son’s character.**

**Dr. Crawford is aware that his statements will be published. Furthermore, the article is blasted onto social media, both Twitter ‘X’ and Facebook. The article contributes to a hostile environment for our son. In the Winter of 2023 our son was sucker punched in the stomach while on campus on a dare from a third party. He had been on the dance floor at the time and never saw it coming. Multiple witnesses were there. He had to be helped to bed by his Brothers and was in so much pain he could not get out of bed for several days. His Fraternity Brothers had to take care of him. He had to quit his part time job at Fed Ex and leave Winter Semester early so that his father, who is a physician, could check him for a ruptured spleen. When our lawyer sent a “Cease and Desist” letter asking the college to remove the online article Gettysburg College responded by saying that The College is “not responsible for any information or statements published by that newspaper.” And that the “statements referenced in the Gettysburgian were made by an individual faculty member, not by the college as an institution.” And that “the article was published by The Gettysburgian, not by the College.”**

**Please see below...**

**"What began in 1897 as a pursuit to keep alumni in touch with their alma mater as “the representative and official organ of the institution” has since advanced, as the College has grown and the publication’s audience expanded."**

**<https://www.gettysburg.edu/news/stories?id=a7c73a6c-aab9-4525-8f9d->**

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**On Wikipedia The Gettysbugian is listed as “owned, published, and headquartered at Gettysburg College.”**

**[https://en.wikipedia.org/wiki/The\\_Gettysburgian](https://en.wikipedia.org/wiki/The_Gettysburgian)**

**The Gettysburgian has a faculty advisor...**

**<https://gettysburgian.com/2022/03/faculty-spotlight-prof-scott-bodderly/>**

**The Gettysburgian also provides Student opportunities...**

### **On-campus internship options**

In particular, Gettysburg College English majors come away with highly developed writing skills. Whether a student majors in English or English with a Concentration in Writing or minors in Writing, opportunities to hone one's writing style abound at Gettysburg College, both within the classroom and beyond. For example:

- The weekly student newspaper, an annual literary magazine, and a yearbook offer students the chance to gain writing, editing, and production experience.

Regrettably, the article remains up today and continues to blast to social media sites. Our lawyer's "cease and desist" demand regarding article was refused and we were threatened once again with the rescinding of our son's scholarship and liquidation damages of \$10,000 for even asking.

No liquidated damages were received on our end.

We have not been notified of any disciplinary action that has been taken against Dr. Crawford.

Furthermore, in a possible effort to cover their tracks the wikipedia page for The Gettysburgian has been updated/changed several times since February 3, 2024. This is easily viewed by looking at the history of the page.

Also, The Gettysburgian page on the Gettysburg College website is now blank.

### **COUNT I**

Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.

(Intentional Discrimination and Hostile Environment Towards White Male Students)

### **COUNT II**

Breach of Contract

COUNT III

Breach of the Implied Covenant of Good Faith and Fair Dealing

COUNT IV

Breach of NDA/Fraudulent NDA

COUNT V

Fraud

COUNT VI

Negligence

COUNT VII

Negligent Misrepresentation

JURY TRIAL DEMANDED

Plaintiffs hereby demand a jury trial for all issues so triable.

PRAYER FOR RELIEF

\$390 million in damages.

(“At May 31, 2023, the endowment

consisted of 900 individual funds with an aggregate market value of approximately \$390 million”).

WHEREFORE, plaintiffs pray and request that a judgment be entered in their favor, and against Gettysburg College, President Iuliano and all Board Members awarding them:

A. Injunctive relief preventing and enjoining Gettysburg College from violating Title VI, including, but not limited to, preventing and enjoining Gettysburg College and its agents from establishing, implementing, instituting, maintaining, or executing policies, practices, procedures, or protocols that penalize or discriminate against White Male students, including plaintiffs in any way, and ordering

Gettysburg College to take all necessary, adequate, and appropriate remedial, corrective, and

preventative measures including by, among other things: (i) disciplinary measures, including the termination of, deans, administrators, professors, and other employees responsible for antiwhite discrimination and abuse, whether because they engage in it or permit it; (ii) disciplinary measures, declining and returning donations, whether from foreign countries or elsewhere, implicitly or explicitly conditioned on the hiring or promotion of professors who



- espouse antiwhiteism or the inclusion of antiwhiteism coursework or curricula; and
- (iv) adding required antisewhitism training for Gettysburg College community members;
- B. Compensatory, consequential, and punitive damages in amounts to be determined at trial;
- C. Reasonable attorneys' fees, costs of suit, and expenses;
- D. Pre-judgment interest and post-judgment interest at the maximum rate allowable by the law; and
- E. Such other and further relief as the Court deems just and proper.

Respectfully submitted,  
Amanda Olewiler

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